

1 ARAVIND SWAMINATHAN (*admitted pro hac vice*)  
aswaminathan@orrick.com

2 REBECCA HARLOW (STATE BAR NO. 281931)  
rharlow@orrick.com

3 THOMAS FU (STATE BAR NO. 325209)  
tfu@orrick.com

4 ORRICK, HERRINGTON & SUTCLIFFE LLP  
The Orrick Building  
5 405 Howard Street  
San Francisco, CA 94105-2669  
6 Telephone: +1 415 773 5700  
Facsimile: +1 415 773 5759

7 Attorneys for Defendant  
8 Lead Intelligence, Inc. d/b/a Jornaya

9  
10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12

13 LORETTA WILLIAMS, individually and on  
behalf of all others similarly situated,

14 Plaintiff,

15 v.

16 DDR MEDIA, LLC, a Pennsylvania limited  
17 liability company, and LEAD INTELLIGENCE,  
18 INC., a Delaware corporation, d/b/a Jornaya,

19 Defendants.

Case No. 3:22-cv-03789-SI

**DECLARATION OF ARAVIND  
SWAMINATHAN IN SUPPORT OF  
DEFENDANTS DDR MEDIA'S AND  
JORNAYA'S MOTION TO COMPEL  
ARBITRATION**

Date: February 17, 2023  
Time: 10:00 a.m.

Judge: Hon. Susan Illston

1 I, Aravind Swaminathan, declare as follows:

2 1. I am a partner with the law firm Orrick, Herrington & Sutcliffe LLP, counsel for  
3 Defendant Lead Intelligence, Inc. d/b/a Jornaya. I make this declaration in support of Defendants  
4 DDR Media's and Jornaya's Motion to Compel Arbitration. I have personal knowledge of the  
5 facts stated herein and, if called as a witness, would competently testify thereto.

6 2. Attached as **Exhibit 1** is a true and correct copy of the snappyrent2own website,  
7 available at <https://snappyrent2own.com>.

8 3. Attached as **Exhibit 2** is a true and correct copy of the snappyrent2own Terms and  
9 Conditions, available at <https://snappyrent2own.com/terms.php>.

10 4. Attached as **Exhibit 3** is a true and correct copy of the snappyrent2own Privacy  
11 Policy, available at <https://snappyrent2own.com/privacy.php>.

12  
13 I declare under penalty of perjury under the laws of the United States and the State of  
14 California that the foregoing is true and correct.

15 Executed on December 15, 2022 in Seattle, Washington.

16  
17 /s/ Aravind Swaminathan  
18 ARAVIND SWAMINATHAN